

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

ADVANTAGE HEALTHCARE, LTD., an  
Illinois corporation, individually and as the  
representative of a class of similarly situated  
persons,

*Plaintiff,*

v.

DNA DIAGNOSTICS CENTER, INC.

*Defendant.*

Case No. 17-cv-9001

Hon. Judge Sharon Johnson Coleman

**DNA DIAGNOSTICS CENTER, INC.'S UNOPPOSED MOTION  
FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S COMPLAINT**

DNA Diagnostics Center, Inc. ("DDC"), by and through undersigned counsel, and for its Unopposed Motion for Extension of Time to Respond to Plaintiff's Complaint, respectfully states as follows:

1. On December 14, 2017, Plaintiff filed this action. (DE 1.)
2. Defendant DDC was served with the Summons, Complaint, and other case initiating documents on December 19, 2017. (DE 5.)
3. Pursuant to Fed. R. Civ. P. 12(a), DDC's deadline to answer or otherwise respond to the Complaint is January 9, 2018.
4. DDC recently retained undersigned counsel to represent them in this litigation.
5. Counsel for DDC are reviewing the Complaint and conducting an investigation into the allegations and need additional time to complete their investigation and prepare the responsive pleading.

6. On January 3, 2018, counsel for DDC contacted counsel for Plaintiff and requested a twenty-one (21) day extension to respond to the Complaint, up to and including January 30, 2018.

7. Plaintiff's counsel stated that they have no objection to DDC's request for additional time to respond.

8. This is DDC's first request for an extension of time to respond to the Complaint, and it is not being made for purposes of delay or any other improper reason. This extension will impact Mandatory Initial Discovery Pilot Project dates.

WHEREFORE, Defendant DNA Diagnostics Center, Inc. respectfully requests this Honorable Court to enter an order (i) extending the deadline by which it must respond to Plaintiff's Complaint to and including January 30, 2018 and (ii) granting all such other relief it deems equitable and just.

DATED: January 4, 2017

Respectfully submitted,

/s/ David S. Almeida

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*Counsel for Defendant*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing **DNA DIAGNOSTICS CENTER, INC.'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S COMPLAINT** was served upon all interested parties using this Court's ECF filing system this 4th day of January, 2018.

/s/ David S. Almeida \_\_\_\_\_